

Exhibit 4

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

CRAIG CUNNINGHAM,

Plaintiff,

v.

ZEETO GROUP, LLC and STEPHEN GOSS,

Defendants.

No. 4:17-cv-00882-ALM-CAN

**DECLARATION OF STEPHAN GOSS IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

I, Stephan Goss, declare as follows:

1. I am the President and Chief Executive Officer of ZeetoGroup, LLC, a Delaware limited liability company. I am over the age of twenty-one and am competent to execute this declaration, which is based upon my personal knowledge unless stated otherwise.

2. My duties as President and CEO include corporate strategy, financial planning, and general corporate oversight.

3. I do not draft, type, or transmit marketing or other types of text messages to be sent Zeeto's customers. I also do not instruct anyone to draft, type, or transmit any particular message.

4. I have never lived in the State of Texas.

5. I have never owned property in the State of Texas.

6. I have never leased property in the State of Texas.

7. I have never opened or maintained bank accounts in the State of Texas.

8. I have never opened or maintained an office in the State of Texas.

9. I have never hired any employees in the State of Texas.

10. I have never owed or paid taxes to the State of Texas.

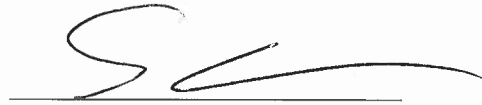
11. I have never engaged in any business in my individual capacity in the State of Texas.

12. I have traveled to Texas approximately four times in the past five years. Three of those times have been in my capacity as CEO of ZeetoGroup, LLC. The last time I traveled to Texas was in 2017, when I traveled to Austin, Texas to attend the Publishing Insiders Summit.

13. Zeeto employees have reported to me that, on or about January 17, 2018, an individual entered Zeeto's corporate offices, grew frustrated regarding his inability to locate an individual for whom he asked, and threw copies of the separate summonses directed to me and Zeeto along with copies of the Complaint on a ping-pong table in Zeeto's reception area.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 7, 2018

A handwritten signature in black ink, consisting of a stylized 'S' followed by a horizontal line, positioned above a horizontal line.